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12 Korea Times of Los Angeles, Inc.

13 UNITED STATES DISTRICT COURT
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15 CENTRAL DISTRICT OF CALIFORNIA
16
17 WESTERN DIVISION
18

19 UNITED STATES OF AMERICA,
20
21 Plaintiff,
22
23 v.
24
25 KOREA TIMES LOS ANGELES, INC.,
26
27 Defendant.
28

Civil No. CV 23 CV 10356 JAK BFM

**STIPULATION TO SET BRIEFING
SCHEDULE FOR MOTION FOR SUMMARY
JUDGMENT**

STIPULATION

21 WHEREAS, plaintiff United States of America ("government")
22 intends to file a motion for summary judgment ("Motion") in this
23 action;

24 WHEREAS, the government and defendant Korea Times Los Angeles,
25 Inc. ("KTLA") desire to set a briefing schedule for the Motion to
26 ensure that the parties will be able to fully and completely address
27 all issues pertinent to the Motion;
28

1 WHEREAS, there is no trial date;

2 WHEREAS, the motion cut-off is currently set for April 3, 2025;

3 WHEREAS, the trial counsel for KTLA is scheduled to travel
4 overseas for family vacation from April 8, 2025 to April 22, 2025,
5 with the hotel accommodation already paid for;

6 THEREFORE, the parties stipulate, and request an order, that:

7 (1) The government shall have until and including April
8 22, 2025 to file its Motion;

9 (1) KTLA shall have 30 days to file its opposition to the
10 Motion;

11 (2) The government shall have two weeks from the filing of
12 KTLA's opposition to file its reply; and

13 (3) The government shall notice the hearing of the Motion
14 in accordance with the briefing schedule above.
15
16

17 Dated: March 3, 2025

Respectfully submitted,

18 JOSEPH T. MCNALLY
19 Acting United States Attorney
20 DAVID M. HARRIS
21 Assistant United States Attorney
22 Chief, Tax Division
23 JOLENE TANNER
24 Assistant United States Attorney
25 Chief, Tax Section

26 /s/ Robert Conte

27 ROBERT F. CONTE
28 Assistant United States Attorney

1 Dated: March 1, 2025

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PIO S. KIM
4 Counsel for Defendant
Korea Times Los Angeles, Inc.